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*Attorneys for Defendant
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
IN SUPPORT OF OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
SUPPLEMENTAL NOTICE OF JOINDER
IN UBER TECHNOLOGIES INC. AND
OTTOMOTTO'S MOTION TO EXCLUDE
TESTIMONY AND OPINIONS OF
WAYMO'S DAMAGES EXPERT
MICHAEL WAGNER (DKT. NO. 1619)**

Hearing Date: September 27, 2017

Hearing Time: 8:00 a.m.

Courtroom: 8, 19th Floor

Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Document Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Version
4. Proof of Service

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of Its Supplemental Notice of Joinder in Uber Technologies Inc. and Ottomotto’s Motion to Exclude Testimony and Opinions of Waymo’s Damages Expert Michael Wagner (Dkt. No. 1619) (the “Supplemental Joinder”).

2. I have reviewed the following document and confirmed that the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Parties
Supplemental Joinder	Highlighted portions	Waymo (green)

3. The above referenced portions of the Supplemental Joinder highlighted in green contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

4. Otto Trucking’s request to seal is narrowly tailored to those portions of the Supplemental Joinder that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 26th day of September, 2017 in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee